

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

**OCEAN STATE TACTICAL, LLC d/b/a BIG :
BEAR HUNTING AND FISHING SUPPLY; :
JONATHAN HIRONS; JAMES ROBERT :
GRUNDY; JEFFREY GOYETTE; and :
MARY BRIMER**

Plaintiffs,

00246-JJM-PAS

v.

**PETER F. NERONHA, in his Official Capacity :
as the Attorney General for The State of Rhode :
Island; and DARNELL S. WEAVER, in his :
Official Capacity as the Superintendent of the :
Rhode Island State Police :**

Defendants.

AFFIDAVIT OF WILL WORTHY

1. I, William Worthy, being one of the Principles of Ocean State Tactical, LLC d/b/a Big Bear Hunting and Fishing Supply (*hereinafter*, “Ocean State”), a Federally Licensed Firearms Dealer, do make oath and affirmation as to the following:

2. Regarding selling back any Standard Capacity Magazines in Ocean State’s current possession, manufacturers of these Standard Capacity Magazines and/or distributors will not take back new or used Standard Capacity Magazines.

3. Distributors and/or Manufacturers will no longer ship certain weapons that are capable of accepting Standard Capacity Magazines to Rhode Island based FFLs because of the Magazine Ban Law. Those Distributors and/or Manufacturers have “flagged” Rhode Island as a State where certain portions of their inventory is not legal, and thus, they will not conduct business with Rhode Island FFLs.

4. Selling (and shipping) the Standard Capacity Magazines in Ocean State’s possession currently would be a tremendous amount of effort and cost. Further, Ocean State would be competing with thousands of online sellers who sell Standard Capacity Magazines.

5. Other FFLs, both in this State, and in other States where these Standard Capacity Magazines are still lawful, will not purchase used Standard Capacity Magazines due to issues of liability involved with used magazines.

6. Attempting to sell any new Standard Capacity Magazines in my inventory currently to other FFLs would be futile, as those FFLs would only give 30% at most of their original value.

7. Several models of firearms, including the Canik TP9SFX, do not have the option for a ten (10) round or less magazine. Its capacity is eighteen (18) rounds.

8. There exists a class of customers (designated by age group 55-70) who shop with Ocean State whose firearms do not accept Magazines under 10 rounds, because the manufacturer either never made a magazine for those models that can accept a ten (10) round or less capacity magazine, and/or that manufacturer no longer makes the model of firearm they own.

9. At present time, most manufacturers do not have magazines capable of 10 rounds or less in stock due to the demand, and you cannot order them due to lack of stock, including Smith and Wesson, Kimber, Springfield, and others.

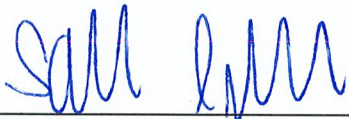
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(Signature)

STATE OF RHODE ISLAND
COUNTY OF Providence

On this 2nd day of November, 2022, before me, the undersigned notary public, personally appeared William Worthy, personally known to the notary to be the person who signed the preceding or attached documents in my presence, and who swore or affirmed to the notary that the contents of the document are truthful and accurate to the best of his knowledge and belief.



(Official Stamp/Seal)
Notary Public



My Commission Expires: 1/1/26